



MEMO ENDORSED

U.S. Department of Justice

United States Attorney
Southern District of New York

United States District Courthouse
300 Quarropas Street
White Plains, New York 10601

June 15, 2022

BY ECF

The Honorable Nelson S. Román
United States District Judge
Southern District of New York
300 Quarropas Street
White Plains, New York 10601

The parties' joint request to adjourn the telephonic Status Conf. from June 21, 2022 until July 21, 2022 at 12 noon is GRANTED.

Clerk of Court is requested to terminate the motion at ECF No. 25.

Dated: White Plains, NY

June 15, 2022

SO ORDERED:

[Signature]
HON. NELSON S. ROMÁN
UNITED STATES DISTRICT JUDGE

Dear Judge Román:

The above-referenced matter is currently scheduled for a status conference on June 21, 2022, at 11 a.m. The Government, and the respective defense counsel for defendants Joseph Maharaj and Shawn Rains, jointly and respectfully request that the conference be adjourned until July 21, 2022, at 12 p.m. This is the first such request for an adjournment.

Should the above application be granted, the Government respectfully requests, with the consent of both defense counsel, that the Court exclude time under the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), from today through the date of the next conference. The Government respectfully submits that an exclusion of time would serve the ends of justice and outweigh the best interests of the public and the defendants in a speedy trial. The requested adjournment would allow the Government to continue producing discovery; would allow defense counsel to continue reviewing that discovery and to evaluate any potential motion practice; and would also allow the Government and defense counsel to engage in discussions regarding a potential resolution of the matter without the need for trial. The Government respectfully encloses a proposed order excluding time for the Court's consideration.

Respectfully submitted,

DAMIAN WILLIAMS
United States Attorney

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USDC SDNY
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cc: Kerry Lawrence, Esq.
Stephen Riebling, Esq.